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Mayfair, London  
W1S 1HN,  
United Kingdom

Dear Sir or Madam,

On behalf of Navenby Energy Limited (the “Interested Party”), I write in relation to the Fosse Green Energy Development Consent Order (DCO) application submitted by Fosse Green Limited (“FGL”), specifically regarding the proposed cable route associated with the FGL project.

On 15 January 2025, an option agreement with the landowner for land directly south of Hill Rise Road, west of Coleby, granting a six-year option to purchase the land was entered into.

The land on which the Interested Party holds an interest is the subject of a Battery Energy Storage System (BESS) planning application (ref. 25/0533/FUL), which North Kesteven District Council validated on 15 May 2025. That application is a live planning consideration and predates FGL’s DCO application.

This is a full planning application for a large, nationally strategic energy storage development, in line with the Department of Energy Security and Net Zero (DESNZ) strategic aims for enabling long-duration energy storage and already qualified under Ofgem’s Long Duration Energy Storage (LDES) project eligibility assessment and currently under consideration by Ofgem for an LDES Cap and Floor Contract Licence.

The proposed grid connection cable route submitted by the Applicant (FGL) for their proposed project cuts through the red line boundary of our LDES project. As defined in the application, FGL’s cable corridor occupies land essential for the delivery and operation of our project. This creates a direct conflict between the DCO proposal and a strategic energy infrastructure project.

The presence of a high-voltage cable and associated easements within the BESS red line would result in the effective sterilisation of the land, preventing any

surface structures within a cable exclusion area, preventing the implementation and operation of the LDES project.

In particular, the exclusion zone would prevent the siting of battery units, transformers, access routes, construction areas, and operational infrastructure, while introducing unacceptable safety, construction, and operational constraints. In practical terms, the coexistence of a third-party electricity cable cutting through our BESS facility area would be incompatible.

I am also concerned that the DCO application provides insufficient clarity as to how the Applicant would access the cable for inspection, maintenance, or fault repair where it passes through or adjacent to the LDES site.

In the event of a cable fault, emergency repair works would likely require unrestricted access, excavation, plant movements, and large working areas. It is unclear how such access could be safely or practically achieved without significant disruption to, or temporary shutdown of, the LDES facility.

This uncertainty gives rise to delivery and operational risk. It also reinforces the incompatibility of locating a 400kV transmission cable within land intended for large-scale strategic LDES infrastructure (this LDES project being 1GW/8GWh), particularly where long-term operational resilience and availability for the transmission network are critical. The lack of a clear, workable access strategy further weighs against the appropriateness of the proposed DCO.

## **Compulsory Acquisition Implications**

I am also concerned that the DCO application gives rise to the potential compulsory acquisition of land or the imposition of permanent rights over land that is required for the LDES scheme. Such an acquisition would significantly prejudice the delivery of the LDES development for which a validated planning application is in place.

In this context, it is not evident that the Applicant can demonstrate that the compulsory acquisition of land within the LDES project red line boundary is absolutely necessary, nor that there is a compelling case in the public interest to frustrate the delivery of the LDES asset, particularly given the apparent availability of alternative routing options which would avoid this conflict altogether.

The acquisition of rights over the LDES land would also fail the test of proportionality, as it would permanently sterilise land capable of supporting a nationally important strategic energy storage infrastructure asset, aligned with Government policy and Ofgem objectives and representing an investment of c. £1bn, when a non-conflicting solution appears achievable.

I therefore request that the Examining Authority give careful scrutiny to the compulsory acquisition powers sought by FGL, insofar as they relate to land south of Hill Rise Road, west of Coleby, and consider whether such powers are justified or required at all.

## **Long Duration Energy Storage and Future Expansion**

The LDES project is being progressed in the context of the Long Duration Energy Storage procurement framework identified in the Planning and Infrastructure Act 2025 by the Government and being implemented by Ofgem. As such, the strategic LDES site may need to accommodate future expansion or reconfiguration to meet evolving technical, commercial, and regulatory requirements associated with LDES delivery.

The introduction of a high-voltage cable and associated easements within the LDES red line boundary would materially constrain the ability of the site to respond to these requirements, thereby undermining its strategic potential to further contribute to ever increasing grid network flexibility and resilience requirements. This reinforces the need to avoid unnecessary sterilisation of land, which is capable of delivering strategic energy infrastructure aligned with national policy objectives.

## **Alternative Cable Routing**

Given the above, I am concerned that the DCO application does not adequately recognise or address the conflict with the LDES project. I therefore request that the Examining Authority require Fosse Green Limited to give further consideration to alternative routing options for their export cable, in particular a more southerly alignment, which would avoid the LDES site altogether. Such an approach would remove the delivery risk to the LDES project.

# NatPower

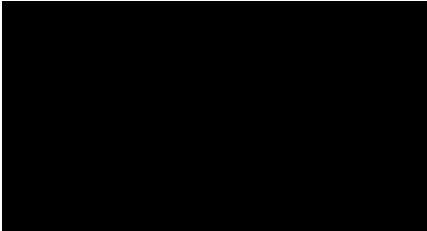
GROWING BY NATURE

## Conclusion

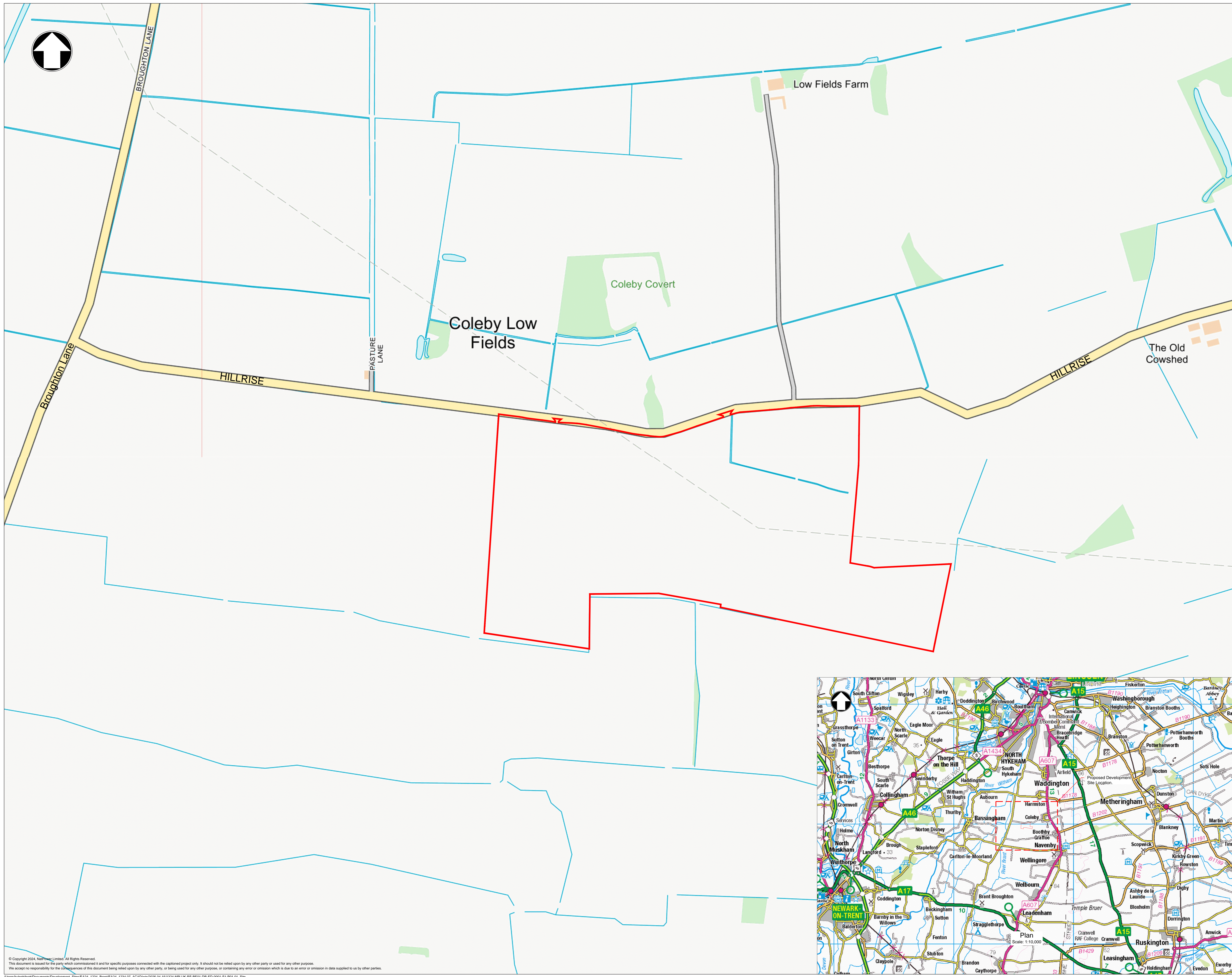
For these reasons, I object to the Fosse Green Energy DCO application in its current form. I request engagement with the Examining Authority to resolve this issue and would be pleased to provide further information if required.

Yours faithfully,

John Sturman  
Managing Director



**NatPower UK**



- Notes
1. All dimensions in metres (m) unless otherwise stated.
  2. All levels in metres above Ordnance Datum (mAOD) unless otherwise stated.
  3. All coordinates in metres relative to flat earth national grid unless otherwise stated.
  4. All dimensions, levels and coordinates should be checked on site.
  5. DRAWING MUST BE READ IN COLOUR.
  6. This drawing is to be read in conjunction with all relevant drawings.

Key to symbols

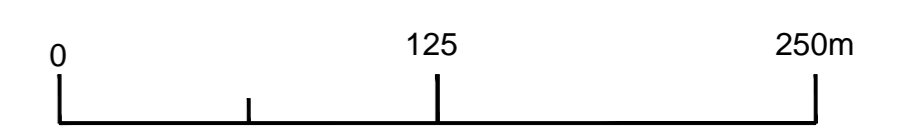
— Planning Application Boundary

Reference drawings

1307-NPLUK-PS-BE01-DR-ED-0003-S1-P01.12\_Proposed Site Layout Plan

Reference models

1324-EMS-PS-BE01-M2-ED-0010-S1-P01.01\_OS-Mastermap  
 1324-NPLUK-PS-BE01-M2-ED-0003-S1-P01.02\_Planning Application Boundary (RLB)



Rev	Date	Drawn	Description	DF	R/J
P01.01	14/04/2025	CJE	Preliminary Issue		

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**Brant Energy Storage Location Plan**

Designed	---	Dwg check	---
Drawn	---	Approved	---
Originator	---		

Suitability Code	Suitability Description	Work Stage	Status	Rev
S1	Suitable for coordination	PS	PRE	P01.01

Scale at A0: 2,500  
 Drawing Number: Figure 1

